

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LAURIE PITLOCK and LUCILLE
PITLOCK,

Plaintiffs,

v.

CORA BEEM, CHIEF OF SAUK
VILLAGE POLICE DEPARTMENT and
VILLAGE OF SAUK VILLAGE,
Defendants.

02C 5693
JUDGE ZAGEL
Trial By Jury Demanded

DOCKETED
AUG 7 2 2002
MAGISTRATE JUDGE KEN
FILED-EDS
AUG -9 PM 3:12
CLERK
U.S. DISTRICT COURT

COMPLAINT

The Plaintiffs, LAURIE AND LUCILLE PITLOCK, by their attorney,
MITCHELL A. KLINE, for a cause of action against Defendants, Cora Beem, Chief of
Sauk Village Police Department [hereinafter Beem] and Village of Sauk Village
[hereinafter Village] alleges as follows:

VIOLATION OF CIVIL RIGHTS

This is an action for violation of Plaintiffs' civil rights under 42 U.S.C. §1983
redress and seeks damages.

THE PARTIES

1. Plaintiff, Laurie Pitlock, is a female citizen and resident of the State of Illinois residing in Sauk Village in the County of Cook.
2. Plaintiff, Lucille Pitlock, is a female citizen and resident of the State of Illinois residing in Sauk Village in the County of Cook.
3. Defendant, Beem, is the Chief of the Sauk Village Police Department and worked in Sauk Village in the County of Cook.
4. Defendant, Village, is a village providing services to its residents, and at

all times relevant herein defendant had a substantial physical and corporate presence within this Judicial District, at Sauk Village, Illinois. Defendant is an employer within the meaning of 42 U.S.C. §2000e(b) and employs more than 100 people.

JURISDICTION AND VENUE

5. This Court has jurisdiction pursuant to 28 U.S.C. §§1331,1343(a) and 1343(a)(4).

6. Venue is proper in this Court pursuant to 28 U.S.C. §1391(b).

7. Plaintiff has fulfilled all administrative prerequisites for the bringing of this lawsuit.

FACTS

8. Plaintiffs lived together in a home located at 2913 E. 223rd Place in Sauk Village, Illinois on August 10, 2000.

9. On August 10, 2000, at approximately 10:00 p.m. the Plaintiffs' back door was forced open by several people.

10. The people who invaded the Pitlocks' home never identified themselves as police officers or showed police badges.

11. The Plaintiffs did not learn the identity of the intruders until they heard the message received by the officers approximately five minutes after the intrusion, which stated that the officers were in the wrong house.

12. Ms. Lucille Pitlock, who is over seventy years old and a diabetic, was very upset and shaking after the invasion; her sugar level experienced a dramatic increase; Ms. Pitlock was prescribed tranquilizers, which she used for approximately four days.

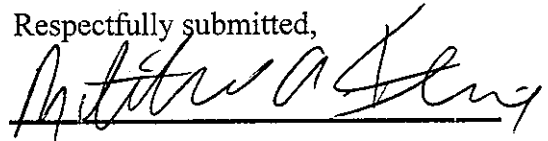
13. Ms. Laura Pitlock who is Lucille's daughter, experienced nightmares after the invasion, which caused her to jump out of bed for approximately two weeks after the intrusion; Laura had difficulty sleeping for at least two months after the invasion.

14. As a result of Defendants' unlawful, unconstitutional conduct, which violated the civil rights of Plaintiffs, Plaintiffs have suffered severe emotional distress.

WHEREFORE, Plaintiffs requests that this Court:

- (a) declare that Defendants violated the civil rights of Plaintiffs;
- (b) award Plaintiffs pecuniary damages in an amount to compensate them for all damage suffered by virtue of Defendants violation of their rights;
- (c) award Plaintiffs compensatory and punitive damages in an appropriate amount;
- (d) award Plaintiff prejudgment interest on damages recovered, at the prime rate, compounded annually, or the rate allowed by law; and
- (e) award costs, reasonable attorney's fees, and such other relief as it deems just.

Respectfully submitted,



Mitchell A. Kline
Attorney for Plaintiffs

Mitchell A. Kline
Law Office of Mitchell A. Kline
203 N. LaSalle Street
Suite 2100
Chicago, Illinois 60601
(312) 558-1454

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

Civil Cover Sheet Input Form

02C 5693

JUDGE ZAGEL

This form has been approved for use by the general public for generating the civil cover sheet for filing new cases in the Northern District of Illinois. Your comments about the form and suggestions for improvements are always greatly appreciated.

DOCKETED

AUG 14 2002 MAGISTRATE JUDGE KEYS

This automated JS-44 conforms generally to manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use **only** in the Northern District of Illinois. (Instructions)

I (a) - PLAINTIFFS		DEFENDANTS	
Laurie Pitlock Lucille Pitlock		Cora Beem, Chief of Police Village of Sauk Village	
b) - County of Residence of First Listed Plaintiff (Except in U.S. Plaintiff Cases) Cook		County of Residence of First Listed Defendant (In U.S. Plaintiff Cases Only) Cook	
Plaintiff's Attorney		Defendant's Attorney (If known)	
Name: Firm: Address: Phone:	Mitchell A. Kline Law Office of Mitchell A. Kline 203 N. LaSalle, 2100 Chgo., IL 60601 312 558-1454	Name: Firm: Address: Phone:	

II. Basis of Jurisdiction

(Select from drop menu below)

3. Federal Question (U.S. not a party) ▼

III. Citizenship of Principal Parties (Diversity cases only)

PLAINTIFF

N/A ▼

DEFENDANT

N/A ▼

IV. Origin

(Select from drop menu below)

1. Original Proceeding ▼

V. Nature of Suit (Select one box)			
<u>Contract</u> <input type="radio"/> 110 Insurance <input type="radio"/> 120 Marine <input type="radio"/> 130 Miller Act <input type="radio"/> 140 Negotiable Instrument <input type="radio"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="radio"/> 151 Medicare Act <input type="radio"/> 152 Student Loan -non VA <input type="radio"/> 153 Recovery of VA Benefits <input type="radio"/> 160 Stockholder Suits <input type="radio"/> 190 Other Contract <input type="radio"/> 195 Contract Product Liability <u>Real Property</u> <input type="radio"/> 210 Land Condemnation <input type="radio"/> 220 Foreclosure <input type="radio"/> 230 Rent Lease & Ejectment <input type="radio"/> 240 Torts to Land <input type="radio"/> 245 Tort Product Liability <input type="radio"/> 290 Other Real Property <u>Bankruptcy</u> <input type="radio"/> 422 Appeal 28 USC 158 <input type="radio"/> 423 Withdrawal 28 USC 157 <u>Property Rights</u> <input type="radio"/> 820 Copyrights <input type="radio"/> 830 Patent <input type="radio"/> 840 Trademark	<u>Personal Injury</u> <input type="radio"/> 310 Airplane <input type="radio"/> 315 Airplane Product Liability <input type="radio"/> 320 Assault, Libel & Slander <input type="radio"/> 330 Federal Employers' Liability <input type="radio"/> 340 Marine <input type="radio"/> 345 Marine Product Liability <input type="radio"/> 350 Motor Vehicle <input type="radio"/> 355 Motor Vehicle Product Liability <input type="radio"/> 360 Other Personal Injury <u>Civil Rights</u> <input type="radio"/> 441 Voting <input type="radio"/> 442 Employment <input type="radio"/> 443 Housing/Accommodations <input type="radio"/> 444 Welfare <input checked="" type="radio"/> 440 Other Civil Rights <u>Forfeiture/Penalty</u> <input type="radio"/> 610 Agriculture <input type="radio"/> 620 Other Food & Drug <input type="radio"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="radio"/> 630 Liquor Laws <input type="radio"/> 640 R.R. & Truck <input type="radio"/> 650 Airline Regulations <input type="radio"/> 660 Occupational Safety/Health <input type="radio"/> 690 Other	<u>Torts</u> <u>Personal Injury</u> <input type="radio"/> 362 Med. Malpractice <input type="radio"/> 365 Personal Injury - Product Liability <input type="radio"/> 368 Asbestos Personal Injury Product Liability <u>Personal Property</u> <input type="radio"/> 370 Other Fraud <input type="radio"/> 371 Truth in Lending <input type="radio"/> 380 Other Pers Property Damage <input type="radio"/> 385 Property Damage Product Liability <u>Prisoner Petitions</u> <input type="radio"/> 510 Motions to Vacate Sentence <u>Habeas Corpus:</u> <input type="radio"/> 530 Habeas Corpus General <input type="radio"/> 535 Habeas Death Penalty <input type="radio"/> 540 Mandamus & Other <input type="radio"/> 550 Civil Rights <input type="radio"/> 555 Prison Condition <u>Labor</u> <input type="radio"/> 710 Fair Labor Standards Act <input type="radio"/> 720 Labor/Mgmt. Relations <input type="radio"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="radio"/> 740 Railway Labor Act <input type="radio"/> 790 Other Labor Litigation <input type="radio"/> 791 E.R.I.S.A.	<u>Other Statutes</u> <input type="radio"/> 400 State Reapportionment <input type="radio"/> 410 Antitrust <input type="radio"/> 430 Banks & Banking <input type="radio"/> 450 Commerce/ICC Rates/ etc <input type="radio"/> 460 Deportation <input type="radio"/> 470 RICO <input type="radio"/> 810 Selective Service <input type="radio"/> 850 Securities / Commodities / Exchange <input type="radio"/> 875 Customer Challenge 12 USC 3410 <input type="radio"/> 891 Agricultural Acts <input type="radio"/> 892 Economic Stabilization Act <input type="radio"/> 893 Environmental Matters <input type="radio"/> 894 Energy Allocation Act <input type="radio"/> 895 Freedom of Information Act <input type="radio"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="radio"/> 950 Constitutionality of State Statute <input type="radio"/> 890 Other Statutory Actions <u>Social Security</u> <input type="radio"/> 861 HIA (1395ff) <input type="radio"/> 862 Black Lung (923) <input type="radio"/> 863 DIWC/DIWW (405(g)) <input type="radio"/> 864 SSID Title XVI <input type="radio"/> 865 RSI (405(g)) <u>Federal Tax Suits</u> <input type="radio"/> 870 Taxes US Plaintiff or Defendant <input type="radio"/> 871 IRS Third Party 26 USC 7609
VI Cause of Action (CITE THE U. S. STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.) <div style="border: 1px solid black; padding: 2px; min-height: 20px;">42 USC 1983</div>			
VII. Requested in Complaint	<input type="radio"/> Class Action Under FRCP 23 <input checked="" type="radio"/> Not Class Action	Demand <div style="border: 1px solid black; height: 20px; width: 100%;"></div>	Jury Demand (requested in Complaint) <input checked="" type="radio"/> Yes <input type="radio"/> No
VIII. This Case	<input checked="" type="radio"/> is not a refile of a previously dismissed action. <input type="radio"/> is a refile of case number _____, previously dismissed by Judge _____		

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Reset Form

M. J. A. King 8-9-02

NOTE: When the print dialogue box appears, be sure to uncheck the Annotations option.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

Eastern Division

Double click on question mark for appearance form instructions

In the Matter of

Laurie Pitlock and Lucille Pitlock

v.

Cora Beem, Chief of Sauk Village Police Department
and Village of Sauk Village

DOCKETED

AUG 12 2002

Case Number

02C 5693

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:
JUDGE ZAGEL

Plaintiffs

MAGISTRATE JUDGE KEYS

(A)		(B)	
SIGNATURE	<i>Mitchell A. Kline</i>	SIGNATURE	
NAME	Mitchell A. Kline	NAME	
FIRM	Law Office of Mitchell A. Kline	FIRM	
STREET ADDRESS	203 N. LaSalle St. ste 2100	STREET ADDRESS	
CITY/STATE/ZIP	Chgo., IL 60601	CITY/STATE/ZIP	
TELEPHONE NUMBER	312 558 1454	TELEPHONE NUMBER	
IDENTIFICATION NUMBER	3122669	IDENTIFICATION NUMBER	
MEMBER OF TRIAL BAR?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	MEMBER OF TRIAL BAR?	YES <input type="checkbox"/> NO <input type="checkbox"/>
TRIAL ATTORNEY?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	TRIAL ATTORNEY?	YES <input type="checkbox"/> NO <input type="checkbox"/>
		DESIGNATED AS LOCAL COUNSEL?	YES <input type="checkbox"/> NO <input type="checkbox"/>
(C)		(D)	
SIGNATURE		SIGNATURE	
NAME		NAME	
FIRM		FIRM	
STREET ADDRESS		STREET ADDRESS	
CITY/STATE/ZIP		CITY/STATE/ZIP	
TELEPHONE NUMBER		TELEPHONE NUMBER	
IDENTIFICATION NUMBER		IDENTIFICATION NUMBER	
MEMBER OF TRIAL BAR?	YES <input type="checkbox"/> NO <input type="checkbox"/>	MEMBER OF TRIAL BAR?	YES <input type="checkbox"/> NO <input type="checkbox"/>
TRIAL ATTORNEY?	YES <input type="checkbox"/> NO <input type="checkbox"/>	TRIAL ATTORNEY?	YES <input type="checkbox"/> NO <input type="checkbox"/>
DESIGNATED AS LOCAL COUNSEL?	YES <input type="checkbox"/> NO <input type="checkbox"/>	DESIGNATED AS LOCAL COUNSEL?	YES <input type="checkbox"/> NO <input type="checkbox"/>

FILED-105
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CLERK
U.S. DISTRICT COURT

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